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SELLING SOURCE, LLC, a Delaware Limited  
Liability Company, and Counter-Respondent  
ALTON IRBY, an individual

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA – SOUTHERN DIVISION

SELLING SOURCE, LLC, a Delaware  
Limited Liability Company,

Plaintiff,

v.

RED RIVER VENTURES, LLC, a Delaware  
Limited Liability Company; CURTIS POPE,  
an individual; CARL MICHAEL LANE, an  
individual; CHARLIE WURM, an individual;  
GORDON JONES, an individual; ZURAB  
DAVITIANI, an individual; and DOES 1  
through 100, inclusive,

Defendants.

RED RIVER VENTURES, LLC, a Delaware  
Limited Liability Company; CURTIS POPE,  
an individual; and CARL MICHAEL LANE,  
an individual,

Counter-Claimants,

v.

SELLING SOURCE, LLC, a Delaware  
Limited Liability Company; and ALTON  
IRBY, an individual,

Counter-Respondents.

CASE NO. 2:09-cv-01491-JCM-(GWF)

**NOTICE OF MOTION AND MOTION  
FOR ORDER TO SHOW CAUSE WHY  
DEFENDANTS SHOULD NOT BE  
HELD IN CONTEMPT FOR  
VIOLATING PRELIMINARY  
INJUNCTION**

Date:

Time:

Courtroom: 6A

Judge: Hon. James C. Mahan

**TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that as soon as the matter may be heard, in the above-captioned Court, plaintiff Selling Source, LLC will, and hereby does, move the Court for a Order to Show Cause why defendants Red River Ventures, LLC, Curtis Pope, and Carl Michael Lane, as well as Impact Payment Systems, LLC and Mr. Scott Clark, should not be found in contempt of the Preliminary Injunction entered by this Court on September 29, 2009, and which remains in effect.

This Motion follows Selling Source's recent discovery that the above-named Defendants are continuing to exploit lead data that is proprietary to Selling Source despite provisions in the Preliminary Injunction forbidding such action. Defendants are engaging in these acts by and through Impact Payment Systems, LLC and Scott Clark, its principal, to whom Defendants admittedly transferred their lead portfolio and who are now pursuing the prohibited leads from an out-of-state location under different business names. The Preliminary Injunction is likewise directed and applicable to each of these third parties, who are subject to its enforcement as aiders and abettors to the contemnor Defendants. Selling Source therefore requests an Order of Court finding each and all of these parties in contempt, enjoining each of them from engaging in the payday loan business and/or paying a daily fine unless and until all Electronic Storage Devices in their possession or under their control (including all computer servers removed by Defendants and so far not produced) are turned over for imaging and preservation, and requiring the contemnor parties, jointly and severally, to compensate Selling Source for the attorney's fees necessarily incurred in connection with the instant Motion in the amount of \$11,275, plus additional sums as may be incurred preparing a reply and attending hearing.

This Motion is based on this Notice, the Memorandum of Points and Authorities and Declarations of Soeren Poulsen, Stephen Gudelj, and Spencer C. Martinez submitted herewith,

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1 the pleadings and files in this action, and upon such further matters as may be presented at  
2 hearing.

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4 Dated: December 21, 2009

ROPERS, MAJESKI, KOHN & BENTLEY

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6 By: /s/ SPENCER C. MARTINEZ

JAMES A. LASSART

ADRIAN G. DRISCOLL

SPENCER C. MARTINEZ

Attorneys for Plaintiff/Counter-Respondent  
SELLING SOURCE, LLC, a Delaware  
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Respondent ALTON IRBY, an individual

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